



# COMMONWEALTH of VIRGINIA

Office of the Attorney General

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## MEMORANDUM

**To:** Dr. Carolynn Bissett  
Program Manager  
Office of Veterinary Services  
Department of Agriculture and Consumer Services

**From:** Justin I. Bell  
Assistant Attorney General

**Date:** April 13, 2020

**Subject:** Letter of Assurance for Regulations Pertaining to the Establishment of the Dangerous Dog Registry, 2 VAC 5 – 620.

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I have reviewed the Department of Agriculture and Consumer Services's (the Department) proposed Regulations Pertaining to the Establishment of the Dangerous Dog Registry that was posted on the Virginia Regulatory Town Hall. In my view, as counsel to the Department, this regulatory action may be taken pursuant to Title 3.2 of the *Code of Virginia*. Further, § 3.2-6542 of the *Code of Virginia* makes this action exempt from the Administrative Process Act (§ 2.2-4000 et seq.). The regulations do not appear to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor do they appear to conflict with any federal or state law currently in effect.

This memorandum addresses legal matters only and is not intended to serve, nor should it be construed, as a comment for or against the merits of the proposed regulations.